

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

NEW VIRGINIA MAJORITY EDUCATION  
FUND and AMYLA BRYANT,

Plaintiffs,

v.

FAIRFAX COUNTY BOARD OF  
ELECTIONS, GARY SCOTT, in his official  
capacity as Director of the Office of Elections  
and General Registrar; and STEPHEN HUNT,  
KATHERINE HANLEY, and BETTINA  
LAWTON in their official capacities as members  
of the Fairfax County Board of Elections,

Defendants.

Civil Action

Case No. 19-cv-1379

**EMERGENCY MOTION FOR  
PRELIMINARY INJUNCTION**

Pursuant to Federal Rule of Civil Procedure 65, Plaintiffs New Virginia Majority Education Fund (“NVMEF”) and Amyla Bryant hereby move for a preliminary injunction requiring Defendants, the Fairfax County Board of Elections, and its General Registrar, to remedy the improper rejection of voter registration applications from Plaintiff BRYANT and approximately 170 other Virginia voters who live on the campus of George Mason University in Fairfax County and registered to vote with their proper campus mailing addresses. A memorandum in support of this motion and a proposed order are being filed contemporaneously herewith.

Dated: October 31, 2019

Respectfully submitted,

/s/ Paul J. Weeks

Paul J. Weeks (VA Bar. No. 89656)

Daniel T. Donovan, P.C. (*pro hac vice* motion forthcoming)

Susan M. Davis (*pro hac vice* motion forthcoming)

Michael A. Glick (*pro hac vice* motion forthcoming)

Paul Quincy (*pro hac vice* motion forthcoming)

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Ezra D. Rosenberg (*pro hac vice – to be filed*)

Julie M. Houk (*pro hac vice – to be filed*)

John Powers (*pro hac vice – to be filed*)

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*Counsel for Plaintiffs*

### CERTIFICATE OF SERVICE

I hereby certify that on October 31, 2019, I caused the foregoing to be electronically filed using the Court's CM/ECF system, which will automatically send a notice of electronic filing to all counsel of record.

/s/ Paul J. Weeks

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